

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Trevon Washington

Case No.

Case: 2:25-mj-30224
Assigned To : Unassigned
Assign. Date : 4/11/2025

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 14, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm.

This criminal complaint is based on these facts:

Continued on the attached sheet.



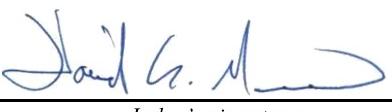
Complainant's signature

Jameria Caldwell, Special Agent (ATF)
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 11, 2025

City and state: Detroit, Michigan



Hon. David R. Grand, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Jameria Caldwell, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosive (ATF) and have been since September 2015. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with the ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, narcotics, armed drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. The ATF is currently investigating Trevon WASHINGTON for violating 18 U.S.C. § 922(g)(1), being a felon in possession of a firearm.

II. PROBABLE CAUSE

4. On March 14, 2025, at approximately 7:46 p.m., two officers with the Detroit Police Department received a report of shots fired at Heckel Park in Detroit, Michigan. When they arrived, they saw numerous individuals at the park. Officers asked some of the individuals if they heard any shots fired. They responded that there may have been fireworks at the opposite end of the park. Officers travelled over to that area and observed four children and two men leaving that area.

5. One of the officers saw an individual, later identified as Trevon WASHINGTON, attempt to walk in the opposite direction, ignoring the officer. This officer observed an L-shaped bulge in the offender's front sweatshirt pocket. The officer approached WASHINGTON and asked him what he had in his pocket. WASHINGTON responded that he had his girl's gun as the officer flashed his light inside WASHINGTON's pocket, observing a firearm. The officer then asked WASHINGTON whether he had a concealed pistol license and WASHINGTON responded that he did not and that he had his girl's gun in his pocket. The officer removed a black Smith & Wesson M&P Shield M 2.0 from WASHINGTON's

front pocket. The officer then arrested WASHINGTON and transported him to the Detroit Detention Center.

6. On April 10, 2025, I consulted with Special Agent (SA) Kevin Rambus, an interstate nexus expert. SA Rambus stated that the firearm, based on the written description provided, without physically examining it, is a firearm as defined by federal law and was manufactured outside the state of Michigan and therefore traveled in and affected interstate commerce.

7. I reviewed records related to WASHINGTON's criminal history and learned that he was currently on federal supervised release for possession with intent to distribute a controlled substance (crack cocaine) in violation of 21 U.S.C. § 841(a)(1), 21 U.S.C. § 841(b)(1)(C). For that offense, WASHINGTON was sentenced to 80 months of imprisonment.

8. WASHINGTON also had two other felony convictions occurring in:

- 2017 for controlled substance - delivery/ manufacture (narcotic or cocaine) less than 50 grams (attempt); and
- 2013 for controlled substance - delivery/ manufacture marijuana and weapons felony firearm.

9. Based on my training and experience, I understand that individuals who plead guilty to felony offenses are advised at their plea/sentencing hearings of the consequences of their guilty plea, including the nature of the offenses that they

have pleaded guilty to. I also understand that individuals who have served prison sentences for felony offenses are similarly advised that they are felons and are not permitted to possess firearms. Based on the above, I have probable cause to believe that WASHINGTON knew he had previously been convicted of an offense punishable by more than one year in prison.

III. CONCLUSION

10. There is probable cause to believe that on March 14, 2025, in the Eastern District of Michigan, Trevon WASHINGTON knowingly possessed a firearm after having been convicted of a felony offense, that he knew of his felony status at the time, and that the firearm affected interstate or foreign commerce, all in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Special Agent Jameria Caldwell
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Date: April 11, 2025